

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

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In Re:
David M. Parsons
Jennifer L. Parsons

Debtor(s)

Chapter 7

Case No.: 20-10092-KCF

Honorable Kathryn C. Ferguson

NOTICE OF MOTION TO AVOID DOCKETED
JUDGMENT AND JUDICIAL LIEN OF BANK
OF AMERICA AS A PREFERENCE AS TO
DEBTOR DAVID M. PARSONS PURSUANT TO
11 U.S.C. 522(h) and 11 U.S.C. 547(b)

Hearing Date: February 4, 2020

ORAL ARGUMENT WAIVED

TO: Bankruptcy Court Clerk
John Michael McDonnell, Trustee
Bank of America, Attn: Officer/Managing Agent
Tenaglia & Hunt Esqs

PLEASE TAKE NOTICE that on February 4, 2020 at 10:00 AM

or as soon thereafter as counsel may be heard, the Debtor(s) or his/her/their attorney will move before the United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey, for an Order to Avoid Docketed Judgment and Judicial Lien of Bank of America as a Preference as to Debtor David M. Parsons pursuant to 11 U.S.C. 522(h) and 11 U.S.C. 547(b)

or such other relief as the Court may direct

Pursuant to D.N.J. LBR 9013(d) et seq., if you wish to contest the within Motion, you must file with the Office of the Clerk of the Bankruptcy Court, within seven (7) days prior to the scheduled hearing, responding papers stating with particularity the basis of your opposition to the Motion. A copy of the proposed Order which is sought is enclosed with this Motion.

Pursuant to D.N.J. LBR 4001-1(d) et seq., appearances are not required by the Court.

The facts do not present complicated questions of fact or unique questions of law, and it is hereby submitted that no brief is necessary for the Court's consideration of the within Motion as provided by D.N.J. LBR 9013-2.

Reliance is on the Certification attached.

Oral argument is waived unless opposition papers are filed and served.

Dated: January 9, 2020

/s/ Joseph I. Windman

Joseph I. Windman, Esq.

Attorney for Debtor(s)